

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

[PROPOSED] ORDER

This matter is before the Court on the parties' Joint Motion for Entry of Discovery Schedule and Extension of Deadlines for Response to Complaint. After reviewing the parties' joint motion and the record as a whole, and finding good cause exists, the motion is GRANTED, and it is further ordered that a Scheduling Order shall issue with the following:

- a. Fact discovery will commence on March 27, 2023.
- b. The parties shall jointly submit a proposed discovery plan pursuant to Federal Rule of Civil Procedure 26(f) on or before March 28, 2023, noting any areas of disagreement between the parties.
- c. Initial disclosures will be served on or before April 3, 2023.
- d. Google's response to the complaint shall be filed on or before May 5, 2023.
- e. Plaintiffs' response to any motion to dismiss (if one is filed) shall be filed on or before June 2, 2023.
- f. Google's reply in support of any motion to dismiss shall be filed on or before June 23, 2023.
- g. A hearing on any motion to dismiss shall be held on June 30, 2023, if the Court determines that a hearing on the motion is warranted.

- h. Substantial completion of document productions in connection with fact discovery shall be completed on or before August 4, 2023.
- i. Fact discovery shall conclude on November 10, 2023, and expert discovery shall commence immediately upon the conclusion of fact discovery.
- j. Plaintiffs' expert reports shall be submitted on or before January 12, 2024.
- k. Defendant's expert reports shall be submitted on or before March 4, 2024.
- l. Plaintiffs' reply expert reports shall be submitted on or before April 22, 2024.
- m. Expert discovery shall conclude on May 31, 2024.
- n. A final pretrial conference shall be held on July 18, 2024 at 10:00a.m.

IT IS SO ORDERED this ____ day of _____, 2023
